



THE CITY OF NEW YORK
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BY ECF

Honorable Sterling Johnson, Jr.
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Jemal Earle v. City of New York, et al., 16-cv-0171 (SJ)(RML)

Your Honor:

I am an Assistant Corporation Counsel assigned to the defense of this matter on behalf of defendants. I write jointly on behalf of the parties to respectfully request an extension of the deadline by which defendants are to file their letter requesting a pre-motion conference in anticipation of their motion for summary judgment and the deadline by which plaintiff is to file a response to that letter. The Honorable Robert M. Levy set a date of August 24, 2018 by which defendants were to file their letter. The parties respectfully request that the Court extend that deadline to August 31, 2018 and to set a date for plaintiff to respond of September 14, 2018. This extension of time is being requested in part so that the parties can explore the possibility of settlement. This is the first request for an extension of this deadline.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/

Angharad Wilson
Senior Counsel

cc: All Counsel (via ECF)